UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

NATHAN MEDINA,

Plaintiff,

٧.

CASE NO. 1:18-cv-01111 HON. JANET T. NEFF MAG. ELLEN S. CARMODY

TOM LEONARD, Michigan State Representative, in his official and individual capacity, THE DOCTORS MANAGEMENT COMPANY, jointly and severally,

Defendants.

Jack W. Schulz (P78078)
Elizabeth A. Gotham (P79058)
SCHULZ GOTHAM PLC
Attorneys for Plaintiff
P.O. Box 44855
Detroit, Michigan 48244
(313) 652-1906
jackwschulz@gmail.com
egotham@schulzgotham.com

Timothy H. Howlett (P24030)
Christina K. McDonald (P73517)
DICKINSON WRIGHT PLLC
Attorneys for Defendant Tom Leonard
500 Woodward Avenue, Suite 4000
Detroit, Michigan 48226
(313) 223-3500
thowlett@dickinsonwright.com
cmcdonald@dickinsonwright.com

Jaclyn R. Giffen (P75316) LITTLER MENDELSON, P.C. Attorneys for Defendant The Doctors Management Company 200 Renaissance Center, Suite 3110 Detroit, Michigan 48243 (313) 202-3261 jgiffen@littler.com

SECOND STIPULATED ORDER TO EXTEND SCHEDULING ORDER DEADLINES

NOW COME the Parties in the above referenced matter and do hereby stipulate to extend the deadline to disclose non-damages related experts set forth within the Court's February 7, 2019 Scheduling Order (DOC NO. 18).

The Parties request this extension to accommodate a requested extension for Defendant The Doctors Management Company to produce its responses, including ESI documents, to Plaintiff's Requests for Production of Documents. The discovery extension was granted in good faith in an attempt to avoid unnecessary motions. However, the extension does not allow Plaintiff's counsel the proper time required to review documents to determine whether a non-damages expert is required as the expert would be retained for the purposes of analyzing these produced documents and related electronic storage. Further, until the documents are reviewed, it is unclear whether the expert will be required in Michigan or California. At the time of this filing, Plaintiff does not possess Defendant The Doctors Management Company's discovery responses. A minimal extension related to the non-damages expert deadlines will allow the parties the time needed to review discovery responses and documents produced and determine if non-damages experts are needed. This extension will not impact any other scheduling date.

Case 1:18-cv-01111-JTN-ESC ECF No. 31 filed 04/24/19 PageID.159 Page 3 of 5

IT IS HEREBY ORDERED that Plaintiff's deadline for naming non-damages

related experts set forth in this Court's February 7, 2019 Scheduling Order will be

extended until May 15, 2019.

IT IS HEREBY ORDERED that Defendants' deadline for naming non-

damages related experts set forth in this Court's February 7, 2019 Scheduling Order

will be extended until May 29, 2019.

IT IS HEREBY ORDERED that Plaintiff's deadline for providing non-

damages related expert reports set forth in this Court's February 7, 2019 Scheduling

Order will be extended until June 15, 2019.

IT IS HEREBY ORDERED that Defendants' deadline for providing non-

damages related expert reports set forth in this Court's February 7, 2019 Scheduling

Order will be extended until June 29, 2019.

IT IS HEREBY ORDERED.

HONORABLE JANET T. NEFF

U.S. District Court Judge

-3-

Approve	d as	to	form	and	content:

Dated: 4/24/19 Dated: 4/24/19		
-------------------------------	--	--

/s/ Jack W. Schulz
Jack W. Schulz (P78078)
Elizabeth A. Gotham (P79058)
SCHULZ GOTHAM PLC
PO Box 44855
Detroit, MI 48244
(313) 652-1906
jackwschulz@gmail.com
egotham@schulzgotham.com
Attorneys for Plaintiff

/s/ Timothy Howlett (w/ permission)
Timothy H. Howlett (P24030)
Christina K. McDonald (P73517)
DICKINSON WRIGHT PLLC
500 Woodward Avenue, Suite 4000
Detroit, Michigan 48226
(313) 223-3500
thowlett@dickinsonwright.com
cmcdonald@dickinsonwright.com
Attorneys for Defendant Tom Leonard

Dated: 4	/24/19
----------	--------

/s/ Jaclyn R. Giffen (w/ permission)
Jaclyn R. Giffen (P75316)
LITTLER MENDELSON, P.C.
200 Renaissance Center, Suite 3110
Detroit, Michigan 48243
(313) 202-3261
jgiffen@littler.com
Attorneys for Defendants The
Doctors Management Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the April 24, 2019, I electronically filed the foregoing document with the Clerk using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic

Case 1:18-cv-01111-JTN-ESC ECF No. 31 filed 04/24/19 PageID.161 Page 5 of 5

Filing generated by CM/ECF or in some other authorized manner for those counsel

or parties who are not authorized to receive electronically Notices of Electronic

Filing.

By: /s/ Jack W. Schulz

Jack W. Schulz (P78078)

DETROIT 85421-1 1497677v2

-5-